

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

PHILIPS LIGHTING HOLDING B.V.,

Plaintiff,

vs.

HOWARD INDUSTRIES, INC. (d/b/a  
HOWARD LIGHTING),

Defendant.

Civil Action No. 2:18-cv-12-KS-MTP

**PHILIPS LIGHTING’S FIRST MOTION TO COMPEL DISCOVERY**

COMES NOW, Plaintiff Philips Lighting Holding B.V. (“Philips Lighting”) in the above-styled and numbered cause of action and submits this Motion to Compel Discovery pursuant to Federal Rules of Civil Procedure 37(a)(1) and (3)(B)(iv).

For the reasons set forth in the accompanying Memorandum of Law, Philips Lighting respectfully requests that the Court enter an Order requiring Howard to produce:

- (1) Complete financial and sales information for all products in the accused product families—Highbay Linear LED series (HLED), LED Highbay (HLA1) series, LED Highbay (HLA2) series, Large LED Wallpack (LWP) Series, Vaporproof Strip (VSL4) series, Mini High Bay (MHB) series, LED Area Light series (XAL), LED Dusk-to-Dawn series (DTDU), and Mini Architectural Wallpack (MAW) series—pursuant to Philips Lighting’s Request No. 27 and
- (2) Samples of HLF060-C1225-048DMVA, HLF075-C14-055DMVA, and HLF096-C1750-054DMVA drivers pursuant to Philips Lighting’s Request No. 13.

Pursuant to Local Civil Rule 37(a), the Good Faith Certificate is attached as Exhibit A.

Dated: October 2, 2018

Respectfully submitted,

By: /s/J. Stephen Kennedy

J. STEPHEN KENNEDY

J. Stephen Kennedy (MS Bar No. 100040)  
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***COUNSEL FOR PLAINTIFF***

***Philips Lighting Holding B.V.***

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing *PHILIPS LIGHTING'S FIRST MOTION TO COMPEL DISCOVERY* with the Clerk of the Court using the ECF system which sent notification of such filing to counsel of record.

Dated: October 2, 2018

By: /s/J. Stephen Kennedy

J. STEPHEN KENNEDY